

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

EVAN GREEBEL,

Defendant.

S1 15 Cr. 637 (KAM)

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND
TO WRITS OF CONTINUING GARNISHMENT**

Mr. Greebel respectfully requests a 45-day extension of his time to respond to the Government's Writs of Continuing Garnishment directed to Charles Schwab & Co, Inc., and Merrill Lynch, Pierce, Fenner & Smith, Inc. (collectively, "Garnishees"). Dkt. Nos. 695, 696. Under the terms of the Writs, Mr. Greebel has twenty days after receiving the Writs, and a further twenty days after receiving Garnishees' answers, to request a hearing on the Writs. The Clerk issued the Writs on November 19, 2018, so Mr. Greebel's initial deadline to respond to the Writs is currently December 10, 2018, and would be extended to January 24, 2019. Because the Garnishees have not yet served their answers, Mr. Greebel's second deadline to respond has not yet begun to run, but would elapse 65 days after the service of the Garnishees' answers under the terms of the proposed extension.

The government consents to Mr. Greebel's requested extension. Mr. Greebel and the government intend to hold these garnishment proceedings in abeyance following answers by the Garnishees pending the resolution of Mr. Greebel's ongoing appeal, and are in the process of preparing a stipulation to that effect. The extension is requested so the government and Mr. Greebel can finalize the stipulation and file it with the Court. The length of the extension is requested to allow for Mr. Greebel's review and approval of the stipulation while in custody.

Given that the intended stipulation will hold the garnishment proceedings in abeyance pending the outcome of his appeal, the government is not prejudiced by the requested extension. No previous extension of these deadlines has been requested.

Dated: New York, New York
November 30, 2018

/s/ **Reed Brodsky**
Reed Brodsky

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